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U.S.D.C. - Atlanta

AUG 23 2019

UNITED STATES DISTRICT COURT
For the
NORTHERN District of GEORGIABy: JAMES N. HATTEN, Clerk
Deputy ClerkKIMBERLY BROWN
333 Nelson Street
Unit 221
Atlanta, GA 30313

V.

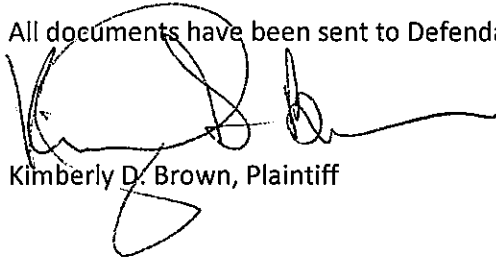
HONORABLE ALEX AZAR
SECRETARY, UNITED STATES
DEPARTMENT OF HEALTH AND
HUMAN SERVICESCIVIL ACTION FILE NO.
1:19-cv-02504-LMM

02152

OBJECTION TO MOTION TO DISMISS WITH PREJUDICE

1. The ongoing hostile workplace lasted from March 20, 2014, through Plaintiff's departure from the Agency, September 6, 2014.
2. Plaintiff was charged AWOL on March 20, 2014, in spite of a medical note from Plaintiff's doctor, and statement from 3 of the Plaintiff's associates (disclosing personal medical information).
3. Plaintiff disputed AWOL charge immediately.
4. Plaintiff discussed an EEOC complaint with her supervisor, Dawne Hines, who said "she'd rather we worked things out".
5. Plaintiff was dissuaded from filing an actual complaint with EEO.
6. Plaintiff felt intimidated by Vincent Williams, and Dawne Hines.
7. Plaintiff discussed the tension with Dawne Hines, who dismissed the issue.
8. A complaint was filed.
9. AWOL charge was reversed on December 18, 2014, after 9 months of being in a hostile environment.
10. On December 18, 2014, Plaintiff was ambushed by supervisory staff, and issued a "Letter of Caution: Excessive Unscheduled Leave, for 3 incidents that happened over a year prior to the issuance of said letter. (retaliation).
11. Plaintiff was placed on a 3 month detail, in the File Room, that lasted 9 months, "while plaintiff's complaint was processed".
12. Plaintiff was asked to "recertify" disabilities with the Agency, even though Plaintiff's disabilities were certified with her application for employment.
13. Plaintiff was belittled and harassed for the remainder of employment.
14. Dawne Hines did nothing to diffuse the situation.
15. Vincent Williams and the plaintiff did not speak for approximately 18 months.

All documents have been sent to Defendant and the District Court on August 23, 2019

A handwritten signature in black ink, appearing to be "Kimberly D. Brown", with a large circular flourish on the left and a horizontal line extending to the right.

Kimberly D. Brown, Plaintiff